## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA, Plaintiff,

v.

Crim. No. 21-00147-01-CR-W-DGK

KEITH T. BROWN,

Defendant.

## MOTION FOR TREATMENT

Comes now, the Defendant, Keith T. Brown, and moves the Court for an order of treatment pursuant to 18 U.S. Code § 4241(d). In support thereof, the Defendant states:

- 1. The Defendant was determined to be incompetent to stand trial due to a mental illness on December 2, 2021.
- 2. The Court ordered that Defendant should be committed to the custody of the Attorney General pursuant to 18 U.S.C. § 4241(d) for hospitalization and treatment in a suitable facility for a reasonable time up to 120 days on February 16, 2022.
- 3. To date the Defendant has not been committed to a hospital for treatment and has been incarcerated in Leavenworth Federal

Prison at address 1300 Metropolitan Avenue, Leavenworth, Kansas.

4. The Defendant suffers from mental illness and without treatment as the Court has already ordered, his condition can deteriorate.

Wherefore, the Defendant moves the Court to order the Attorney General to hospitalize the defendant for treatment in a suitable facility pursuant 18 U.S.C. § 4241(d).

## s/ Razmi M. Tahirkheli

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## CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a copy of the foregoing was delivered on June  $29^{\rm th}$ , 2022, to the CM-ECF system of the United States District Court for the Western District of Missouri and a copy has been emailed to:

D. Michael Green Assistant United States Attorney

s/Roberta M. Frost
Roberta M. Frost
Legal Assistant